

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 13  
 )  
Tyrelle Marquis Williams ) CASE NO. 17-57526-PMB  
 )  
 )  
DEBTOR. )

**CHAPTER 13 TRUSTEE'S  
OBJECTION TO CONFIRMATION & MOTION TO DISMISS**


COMES NOW Adam M. Goodman, Chapter 13 Trustee, and objects to confirmation of the plan and files this motion to dismiss under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The Debtor has failed to maintain payments into this case as required by 11 U.S.C. Section 1326.
2. The Debtor has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).
3. The Debtor's Plan and Schedules fail to fully disclose information regarding the individual Domestic Support Obligation holder. The Debtor must provide the Chapter 13 Trustee with the name, address and telephone number for said individual. 11 U.S.C. Section 1302(d)(1)(A)(ii).
4. In accordance with General Order No. 18-2015 and the annexed Statement of Rights and Responsibilities, the Debtor's attorney should timely provide proof of Debtor's \$400.00 per month Chili's cash tips to the Chapter 13 Trustee. 11 U.S.C. Sections 521(a)(1), 1325(a)(3), 1325(a)(6), 1325(b)(1)(B) and Bankruptcy Rule 1007.
5. The Chapter 13 budget fails to include Debtor's Domestic Support Obligation; \$100.00 per month utilities and medical expenses between \$200.00 and \$250.00 per month; thereby, possibly rendering the proposed Chapter 13 plan payment to be infeasible, in violation of 11 U.S.C. Section 1325(a)(6).
6. Pursuant to information received from the Internal Revenue Service, 2015 tax return has not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 Plan, in violation of 11 U.S.C. Sections 1322(d) and 1325(a)(6).

Adam M. Goodman, Chapter 13 Trustee  
Suite 200 – 260 Peachtree Street, N.W.  
Atlanta, Georgia 30303  
(678) 510-1444

7. Based upon a review of the Debtor's payslip, it appears that the Debtor's net monthly income as reflected on Schedule I may be overstated. The payslip reflects net monthly income of \$456.23, while Schedule I reflects net monthly income of \$986.00. The Debtor's Plan and Schedules should be amended accordingly. 11 U.S.C. Section 1325(a)(6).

WHEREFORE, Trustee moves this Honorable Court to inquire into the above objections at the separately scheduled and noticed confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

  
\_\_\_\_\_  
/s/ Adam M. Goodman  
Adam M. Goodman  
Chapter 13 Trustee  
GA Bar No. 300887

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 13  
Tyrelle Marquis Williams )  
 ) CASE NO.: 17-57526-PMB  
 )  
DEBTOR. )

17-57526-PMB

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served:

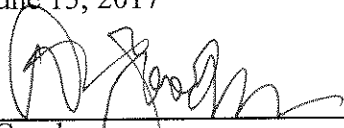
DEBTOR(S):  
Tyrelle Marquis Williams  
685 Simon Ive Dr  
Lawrenceville, GA 30045

DEBTOR(S) ATTORNEY:  
King & King Law L.L.C  
215 Pryor Street, SW  
Atlanta, GA 30303

in the foregoing matter with a copy of this Objection to Confirmation & Motion to Dismiss by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

Tuesday, June 13, 2017

/s/

  
Adam M. Goodman  
GA Bar No. 300887  
Chapter 13 Trustee  
260 Peachtree Street, NW, Suite 200  
Atlanta, GA 30303  
Telephone: 678-510-1444  
Facsimile: 678-510-1450